

Message

From: Melvin, Karen [Melvin.Karen@epa.gov]
Sent: 7/15/2021 1:05:49 PM
To: Gillespie-Marthaler, Leslie [GillespieMarthaler.Leslie@epa.gov]
CC: Rogers, Rick [rogers.rick@epa.gov]
Subject: FW: [External] Clarksburg: Example Sampling Plans
Attachments: DC0000002 LCR Sample Plan 2021_web.pdf; LCR Guidance Manual Volume I - Monitoring (Sept 1991).pdf; R8_lcr_tap_sample_site_plan.pdf; R8_lcr_tap_sample_site_plan_instructions.pdf; 1991 LCR Guidance Manual Volume 1 Chapter 3.pdf; LCR Sample Site Selection and Triennial Monitoring Memo 10-13-16.pdf

Just so we're clear, Clarksburg is obligated to develop a sampling plan – not the state. I suppose they could use these for items to check for in any plans that Clarksburg submits to the state,

**KAREN MELVIN, DIRECTOR
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION
US EPA, REGION 3
1650 ARCH STREET
PHILADELPHIA, PA 19103
215-814-3275**

From: Zirilli, Alysa
Sent: Wednesday, July 14, 2021 6:21 PM
To: Meredith Vance <meredith.j.vance@wv.gov>
Cc: Crumlish, Karen <Crumlish.Karen@epa.gov>; Rogers, Rick <rogers.rick@epa.gov>; Stanmyer, Ruby <Stanmyer.Ruby@epa.gov>; Rizzo, George <Rizzo.George@epa.gov>; Henry, JeannaR <Henry.Jeannar@epa.gov>; Calcinore, Sara <calcinore.sara@epa.gov>; Zedella, Leah <Zedella.Leah@epa.gov>; Michelle Cochran <michelle.L.Cochran@wv.gov>; Gillespie-Marthaler, Leslie <GillespieMarthaler.Leslie@epa.gov>; Armstrong, Joan <Armstrong.Joan@epa.gov>; Melvin, Karen <Melvin.Karen@epa.gov>
Subject: RE: [External] Clarksburg: Example Sampling Plans

Hi Meredith. As promised, attached are resources to assist Clarksburg with development of its sampling plan:

1. DC Water's 2021 LCR sampling plan, which may serve as an example format. This plan is available on DC Water's website as well: https://www.dcwater.com/sites/default/files/documents/LCR%20Sample%20Plan%202021_0.pdf
2. EPA Region 8's template & instructions for creating a LCR sampling plan, developed for their direct implementation program. These are also available on Region 8's website here: <https://www.epa.gov/region8-waterops/reporting-forms-drinking-water-systems-wyoming-and-tribal-lands-epa-region-8#lcr>
3. EPA's LCR Guidance Manual: While the LCR includes the minimum requirements for review, EPA's guidance includes many more suggestions for items to review. The original LCR Guidance Manual Vol. 1 includes materials inventory development information in Chapter 3 and Appendix B. Chapter 3 also includes information on developing a sample site plan. The .pdf of the original guidance document was created using photocopies, so the print quality is inconsistent. The separate Chapter 3 .pdf is more readable than it is in the guidance manual.
4. EPA's 2016 Water Supply Guidance memo pertains to documenting sample site changes for systems in triennial monitoring status. It is also available online: https://www.epa.gov/sites/production/files/2016-10/documents/lcr_sample_site_selection_and_triennial_monitoring_wsg200.pdf

Additional helpful information:

- LSL identification methods – Clarksburg may want to search the web, including but not limited to [AWWA](#), for the latest material. In addition Clarksburg may want to review the web sites of some larger PWSs which have posted recommendations to their customers about how to identify LSLs within their premises. Here are links to DC Water's (<https://www.dewater.com/lead>) and the Philadelphia Water Department's (<https://water.phila.gov/lead/>).
- Another method that Clarksburg could use to identify a LSL is to collect a second sample after the first draw sample. The second sample would not be considered a compliance sample if the first draw sample was considered to be one. They may also want to collect a second sample after a first-draw non-compliance sample. In either case, the second sample should be one-liter, and collected about 5 to 6 liters after the first. The timing is dependent on the length of the service line. The samples should be analyzed in each of two ways. The LCR required method requires that the sample be acidified so that any lead particles are totally dissolved before analysis. The result will be the total lead amount as required by the LCR. The other method is to filter a portion of the sample to remove lead particles, and then analyze the filtrate separately. If the filtered lead result is much less than the acidified sample result, it is likely that lead particles are detaching from the service line interior and the service line is likely.
- Another aspect that WVDHHR may want to consider if a thorough and accurate materials inventory is completed: if Clarksburg can verify that their system has relatively few partial or full LSLs still in place, they may want to consider voluntary full replacement of the remaining partial and full LSLs as an alternative to additional CCT. Over time, full replacement may be more effective and less expensive than the cost of treatment devices and chemicals, and more permanent.

Kind regards,
Alysa

Alysa Zirilli, P.G.
Acting Chief
Drinking Water Section
EPA Region III
Phone: (215) 814-5733
zirilli.alysa@epa.gov

From: Vance, Meredith J <Meredith.J.Vance@wv.gov>
Sent: Friday, July 09, 2021 4:49 PM
To: Zirilli, Alysa <Zirilli.Alysa@epa.gov>; Michelle Cochran <michelle.L.Cochran@wv.gov>
Cc: Crumlish, Karen <Crumlish.Karen@epa.gov>; Rogers, Rick <rogers.rick@epa.gov>; Stanmyer, Ruby <Stanmyer.Ruby@epa.gov>; Rizzo, George <Rizzo.George@epa.gov>; Henry, JeannaR <Henry.Jeannar@epa.gov>; Calcinore, Sara <calcinore.sara@epa.gov>; Zedella, Leah <Zedella.Leah@epa.gov>
Subject: RE: [External] Clarksburg: Example Sampling Plans

I think that would be helpful. Thank you

From: Zirilli, Alysa <Zirilli.Alysa@epa.gov>
Sent: Friday, July 9, 2021 4:45 PM
To: Cochran, Michelle L <Michelle.L.Cochran@wv.gov>; Vance, Meredith J <Meredith.J.Vance@wv.gov>
Cc: Crumlish, Karen <Crumlish.Karen@epa.gov>; Rogers, Rick <rogers.rick@epa.gov>; Stanmyer, Ruby <Stanmyer.Ruby@epa.gov>; Rizzo, George <Rizzo.George@epa.gov>; Henry, JeannaR <henry.jeannar@epa.gov>; Calcinore, Sara <calcinore.sara@epa.gov>; Zedella, Leah <Zedella.Leah@epa.gov>
Subject: [External] Clarksburg: Example Sampling Plans

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Hi, Michelle and Meredith. WVDHHR's administrative order to Clarksburg requires the system to develop a corrective action plan in accordance with the LCR within 30 days (Section B.2 of the Order). Does WVDHHR have an example format that it can provide to Clarksburg? If not, and if it would be helpful to Clarksburg, our Deputy Division Director suggested that our office provide an example to you to share with the system. Perhaps just seeing the format of what a materials inventory or sampling plan could look like would help Clarksburg spur or keep momentum. If we can assist in this effort, we stand ready.

Kind regards,
Alysa

Alysa Zirilli, P.G.
Acting Chief
Drinking Water Section
EPA Region III
Phone: (215) 814-5733
zirilli.alysa@epa.gov